

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
*as assignee of individuals who are Covered
Persons*, PATRICK COLLIGAN, and
PETER ANDREYEV,

Plaintiffs,

v.

DARKOWL, LLC, RICHARD ROES 1-10,
*fictitious names of unknown individuals and
ABC COMPANIES 1-10, fictitious names of
unknown entities*,

Defendants.

Civ. Action No. 1:24-cv-10600

**NOTICE OF MOTION FOR *PRO HAC*
VICE ADMISSION**

**NOTICE OF MOTION
FOR *PRO HAC VICE* ADMISSION OF ELLIOT C. HARVEY
SCHATMEIER**

TO: All Counsel of Record

PLEASE TAKE NOTICE that Plaintiff Atlas Data Privacy Corporation (“Plaintiff”) respectfully moves this Court pursuant to *Local Civ. R. 101.1(c)* to admit Elliot C. Harvey Schatmeier pro hac vice in connection with this matter.

PLEASE TAKE FURTHER NOTICE that Plaintiff will rely upon the Certification of Rajiv D. Parikh, Esq., and Eric Palmer in support of this application. A proposed Order is attached.

Respectfully submitted,

PEM LAW LLP

Dated: January 9, 2025

By: *s/ Jessica A. Merejo*

JESSICA A. MEREJO
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CERTIFICATE OF SERVICE

I, JESSICA A. MEREJO, of full age, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and an associate at the law firm of PEM Law LLP, attorneys for plaintiffs in the above-captioned matter. I am admitted to practice in the United States District Court for the District of New Jersey. I have personal knowledge of the information provided in this Certification in accordance with *Local Civ. R. 7.2(a)*.

2. I am a member in good standing of the bar of this Court.

3. On this date, I filed a true and correct copy of the Motion for *Pro Hac Vice* Admission of Elliot C. Harvey Schatmeier, along with the Notice of Motion for *Pro Hac Vice* Admission, Certification of Elliot C. Harvey Schatmeier, the Certification of Counsel, and Proposed Order.

Dated: January 9, 2025

PEM LAW LLP

Jessica A. Merejo

JESSICA A. MEREJO

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